

JEROME R. BOWEN, ESQ.
Nevada Bar No.4540
BOWEN LAW OFFICES
9960 W. Cheyenne Ave., Suite 250
Las Vegas, Nevada 89129
Telephone: (702)240-5191 ♦ Facsimile: (702) 240-5797
twilcox@lvlawfirm.com
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

ARASH HASHEMI, an individual

Case No.: 2:19-cv-00212-RFB-NJK

Plaintiff,

vs.

PROGRESSIVE NORTHERN INSURANCE
COMPANY, a foreign corporation; DOES I
through X, inclusive; and ROE
CORPORATIONS, I through X, inclusive,

Defendants.

**STIPULATION AND ORDER EXTENDING THE TIME TO FILE OPPOSITION TO
DEFENDANT PROGRESSIVE NORTHERN INSURANCE COMPANY'S MOTION
FOR SUMMARY JUDGMENT
(First Request)**

The Parties have stipulated to give Plaintiff a one (1) week extension of time to file the Opposition to Defendant Progressive Northern Insurance Company's Motion for Summary Judgment (ECF No. 28) in this matter. The reasons supporting this stipulation are as follows: Plaintiff's counsel has been traveling out of town conducting out of state meetings and depositions. The Plaintiff wishes to provide the Court a complete outline of facts and issues.

The Parties request a one (1) week extension of time, up to and including, December 10, 2019, for Plaintiff to file his Opposition. This is the first extension of time requested by the Parties related to this Motion (ECF No. 28).

BOWEN LAW OFFICES
Conquistador Plaza
9960 W. Cheyenne Ave, Suite 250
Las Vegas, Nevada 89129
702-240-5191 FAX: 702-240-5797

1 IT IS STIPULATED AND AGREED by and between the parties that Plaintiff shall have up
2 to and including December 10, 2019, to file its Opposition to Progressive Northern Insurance
3 Company's Motion for Summary Judgment (ECF No. 28).


4 Dated this 3rd day of December, 2019.

Dated this 3rd day of December, 2019.

5 /s/ Jerome R. Bowen, Esq.
6 JEROME R. BOWEN, ESQ.
Nevada Bar No. 4540
7 BOWEN LAW OFFICES
9960 W. Cheyenne Avenue, Suite 250
8 Las Vegas, Nevada 89129
Attorneys for Plaintiff

/s/ John T. Keating, Esq.
JOHN T. KEATING, ESQ.
Nevada Bar No. 6373
KEATING LAW GROUP
9130 W. Russell Road, Suite 200
Las Vegas, Nevada 89148
Counsel for Defendant

9 IT IS SO ORDERED.

10
11 
12 RICHARD F. BOULWARE, II
13 UNITED STATES DISTRICT JUDGE

14 DATED this 5th day of December, 2019.